

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

ROCKET LADY UNLIMITED ENTERPRISES, LLC  
D/B/A OUR HEARTS TOGETHER, LLC  
Plaintiff

VS.  
CIVIL ACTION NO. 4:24-CV-04903

Reliant Retail Energy, LLC ET.AL.  
Defendant

United States Courts  
Southern District of Texas  
**FILED**

MAR 18 2025

Nathan Ochsner, Clerk of Court

FIRST AMENDED COMPLAINT

**US DISTRICT BANKRUPTCY COURTS SOUTHERN DISTRICT OF TEXAS**  
**HOUSTON DIVISION**

Rocklady Unlimited Enterprises, LLC formally  
 Our Hearts Together, LLC

Plaintiff(s),

vs.

The United States of American

RELIANT RETAIL ENERGY, LLC, Et. Al.

) Case No.: 4:24-CV--04903  
 ) **FIRST AMENDED COMPLAINT**  
 )  
 ) **DATE: March 14, 2025**  
 ) **TIME: TBD**  
 ) **DEPT: Human Rights**  
 ) Judge: Andrew Hanen  
 ) Dept: US DISTRICT COURTS SOUTHERN  
 ) DISTRICT- HOUSTON DIVISION  
 ) Action Filed: March 14, 2025  
 ) Trial Date: TBD  
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TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, DR. LAKEISHA MENIFEE (ALSO KNOWN AS LAKEISHA HAMILTON, LAKESHA Y. HAMILTON, LAKEISHA Y. MENIFEE, Lakeisha Y. Hamilton, LAKEISHA HAMILTON-REED, LAKEISHA REED, LAKEISHA Y. REED, DR. KIKI, and SUBSIDIARIES ROCKETLADY UNLIMITED ENTERPRISES, LLC, ABUNDANCE ENERGY CONSORTIUM (formally, ABUNDANCE EDUCATIONAL CONSULTING, LLC), ROCKETLADY UNLIMITED, LLC AND STEM UP 501 c3 comes now for cause of action show unto the court the following:

I. DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Discovery Level III.

II. PARTIES AND SERVICES

2. Plaintiff, DR. LAKEISHA MENIFEE (ALSO KNOWN AS LAKEISHA HAMILTON, LAKESHA Y. HAMILTON, LAKEISHA Y. MENIFEE, Lakeisha Y. Hamilton, LAKEISHA HAMILTON-REED, LAKEISHA REED, LAKEISHA Y. REED, DR. KIKI, and SUBSIDIARIES ROCKETLADY UNLIMITED ENTERPRISES, LLC, ABUNDANCE ENERGY CONSORTIUM (formally, ABUNDANCE EDUCATIONAL CONSULTING, LLC), ROCKETLADY UNLIMITED, LLC AND STEM UP 501 c3, hereinafter called termed the Plaintiff, is an individual and subsidiary composites of corporations and a nonprofit organization whose address is 19902 Rustlewood Dr. Humble, TX 77338.
3. Defendants, are composites of corporations and politics under Constitutional Law and regulatory agencies aforementioned, and may be served via USM-285 at their respective physical and mailing addresses or wherever a known affiliated of the organization may be found. Service of said Defendant can be effected by U.S. Marshall.

III. JURISDICTION AND VENUE

4. The subject matter for Plaintiff, Dr. Lakeisha Menifee is REAL PROPERTY 19902 RUSTLEWOOD DR. HUMBLE, TX 77338 in controversy which supersede the jurisdiction of this court to Federal Question due to Texas use Multiple Tenant Environments in accordance with Federal Communications Commission, and the violation of Federal Contracting.



5. The citizenship for Plaintiff in controversy Dr. Lakesha Meniffee the United States of America of jurisdiction of this court to Department of Justice due to SHERMAN ACT in accordance with Texas use of Houston 2020 Microsoft Digital Alliance, Google Antitrust along with Equifax breach that have allowed the continued compromises to Plaintiff's Identity and privacy in varied states at 19902 Rustlewood Dr. Humble, TX 77338 and the Texas Workforce Solution Humble, 9668 Farm to Market 1960 Bypass Rd. W. Humble, TX 77338.

#### DEFINITIONS

6. GANG STALKING: Orchestrated harassment and intimidation by a larger collective against a "targeted individual,"" T.I.", in a virtual community formed by liked minded individuals that stand to benefit in the event the T.I. suffer, consortium, revocation of custodial rights, financial hardship, mental incapacitation, and/or mortality.

#### IV. CLAIM:

7. Defendant has breached fiduciary responsibility and duty to Plaintiff by allowing fraud to take place on T-Mobile account since April 4, 2024, and Plaintiff's Mobile Network to exist on both Xfinity and T-Mobile Network from March 25, 2024 to present. Currently Plaintiff is getting billed from both Xfinity Mobile and T-Mobile, and not receiving the royalties of Our Hearts Together being sold in Chicago when all Mobile numbers were successfully ported out to T-Mobile, and Plaintiff has reported that an alternated devices have been ordered through the Xfinity Network via Assurant starting on April 4, 2024, without Plaintiff's Permission, and T-Mobile continues to charge Plaintiff for usage and refuses to investigate fraud. In addition, Defendant has granted access to police and judicial officials federally regulated access to Plaintiff's Mobile services without a federal warrant or any claims of abuse. Currently Plaintiff is Victim of Sexual Assault, Identity Theft and Police Brutality, and not under any federal investigation, and policing agencies have absolutely no reason outside of terroristic harassment and falsification of records to request access to the mobile network of Plaintiff. Plaintiff request a Federal Investigation on Insurance Fraud, Identity Theft and Financial Crimes reported by Plaintiff starting from February 12, 2024, to current date in alignment with Defendant. These reports are related to and not limited to , Mortgage Fraud, Real Estate Fraud, Financial Fraud, Sextortion of Minor Children, Identity Theft, Police Brutality and Sexual Assault of Plaintiff.
8. David Burgess, is the alias that GANG Stalkers use to assigned Comcast Phone of Texas and Comcast Cable Communication Management, LLC to Plaintiff's Phone Numbers to Real Properties in Richmond, TX

Account Number	Mailing Address	Phone Number
1231542466654	6011 Driscoll Park Dr. Richmond TX,	XXX-XXX-2001
1231542423355	6011 Driscoll Park Dr. Richmond TX,	XXX-XXX-2001
8777702032727609	13710 Cullondon CT Richmond, TX	XXX-XXX-2001
8777702032704517	13710 Cullondon CT Richmond, TX	XXX-XXX-2001

9. Currently the Real Property in question 19902 Rustlewood Dr., Humble, TX 77338 has a Utility Easement equipped with an Enphase Mobile Antenna pole attachment which is not receiving royalty payments.
10. Plaintiff has been identified as a Targeted Individual, T.I., to retrieve the real property 19902 Rustlewood Dr. Humble, TX 77338, and deplete Plaintiff right to the subsidiary composites for corporations and the nonprofit organization's copyright, royalties and trademarks.



11. Defendant has refused to pay invoices for royalty payments due to Plaintiff, or acknowledge the Fraud that has taken place within the environment, and continues to collaborate with the orchestrators of GANG STALKING, that take funds from the Plaintiff, delay court proceeding, steal and delay mail, and deny funding after sexual assault and modify medical records to protect officers and predators. In addition, Plaintiff, has had to terminate all employees, discontinue book sales due to duplicate copies being sold on websites without authorization.
12. In addition, cyber-attacks on minor children that explicit images of Plaintiff's minor children were reported to Precinct 4 Cyber Crime team have gone unchecked. The sextortion and cyber-attacks on minor children were repeatedly reported by Plaintiff to Child Protective Services and Harris County Precinct 4 Constables, and as opposed to researching the claims Constables attempted to accuse Plaintiff of sex-trafficking.
13. Judge Dawn Rodgers dismissed the physical attack of the two male constables on female plaintiff with prejudice and did not provide Plaintiff an opportunity to perform discovery, while expediting court proceedings.
14. Jude Jeralynn Manor signed Protective Orders for two White Male Cyber Crimes Detectives Jeffrey Lee and Kamron Mulkey that oversee Child Pornography to ensure that they would be protected from providing evidence or testimony, refused to provide Plaintiff an opportunity for hearing, and modified Texas Rules of Civil Procedures to meet the needs of Harris County Commissioners Court.
15. Sunrun Gemini Manager reduced proceeds from Abundance Consortium, LLC (formally Abundance Educational Consulting, LLC) removing Dual Registered Meter and replacing it with a Smart Meter while in collaboration with Reliant Energy with the support of a of cloned cellular device on local network controlled via Tesla Gateway and server on Comcast network located at 1002 Gemini St. Houston, TX 77058. Meter that was replaced by Sunrun can be remotely controlled by Sunrun to turn on and off the access to solar power thereby increasing the light bill and providing more energy to the grid and granting a greater pay out to the Retail Energy Provider.
16. Throughout this process Plaintiff, spoke with a Comcast representative that stated that if Child Protective Services were involved that he could work with police. Plaintiff's daughter was solicited for images in the 5<sup>th</sup> grade and now she is in the 10<sup>th</sup> grade, and it does not take the police or CPS 5 years to identify breadcrumbs left from IP addresses or collaborate with FBI to filter through VPN's. In like manner, the Plaintiff's son was in the 9<sup>th</sup> grade when he was approached online, and currently he is 21 years old. However; when the Plaintiff's son was 17 years old he was dating a white girl that ran away from home, and 3 police officers arrived at the Plaintiff's home from the Montgomery Sheriff's office to question a 17 year old black male if he knew where a white girl had run away too, but no one can identify anyone online that solicited the Plaintiff's two minor Black children for inappropriate pictures, and the two Black Female Judges will not even provide the Plaintiff an opportunity to be heard.
17. **Food for Thought:** Consider that police officers were able to locate individuals in Logos, Nigeria for sextortion of a White Male in Marquette Michigan, and Plaintiff who lives Humble, Texas could not commission the support of Harris County Precinct 4 Constables to identify a suspect in Kingwood, TX that solicited elicit pictures a 5<sup>th</sup> grade Black Girl. As a matter of fact, the Plaintiff, as an 8<sup>th</sup> grade Science Teacher, delivered the first suspect to the Harris County Precinct 4 Cyber Crimes Team. Questions that continue to plague the heart of a Victim of Crime: Why do I have to provide suspects to the Houston Police Department for the criminals that continue to victimize my environment? Why has no one asked me who sexually assaulted me? How can the Attorney General close my rape case, and no one interview me about the suspect, or even took the clothes from the night of the rape? Why won't the officers



release the video tapes of the night when I was physically attacked by Police Officers, and I was reporting that all I wanted was help? The answers to these questions are as evident as the reason as they exist. Protectors have become predators, and authorities are protecting responsible parties to prevent state accountability of indiscretions towards the Plaintiff, and her family from within the county. Meanwhile Harris County Judges have been assigned to protect the corruption of the organization. The Plaintiff regrettably inclines to inform the court that all Black people are **NOT** criminals, however; the intrusive nature of Defendant(s) is very much so a criminal act.

#### V. FACTS

10. Energy Brokers from Reliant Energy Identified Abundance Educational Consulting, LLC in 2017 through cold calls and completed the switch from market class from residential to business over the phone.
11. Energy Brokers never identified third-party name.
12. Real Property 19902 RUSTLEWOOD DR. was equipped with Enphase wireless antenna as of November 2, 2021, by way of (SUNRUN) solar panel installation, SUNRUN GEMINI MANAGER is a third-party licensed Energy Broker with the Public Utilities Trade Commission of Texas. Enphase Wireless Antenna's at REAL PROPERTY are used to foster cellular transmission in HARRIS COUNTY, TEXAS and the infrastructure of the Bush Airport. Prior to receiving Enphase system **T-Mobile** provided a Signal Booster to Plaintiff in 2012 for free that the company is now providing as a paid service to customers via a wireless internet router that resembles the Signal Booster provided to Plaintiff in 2012. Real Property, originally had a 15 foot structured hardwired antenna in the rear of the access point courtesy of CenturyLink on purchase date of May 22, 2002. From May 22, 2002 to present T-MOBILE, XFINITY, VERIZON, Centurylink, DirectTV, Comcast, nor ATT have granted royalty compensation to Plaintiff for the right away easement use of antenna during the 22-year residence. In addition, (PHH MORTGAGE (Formally Century 21 Mortgage D/B/A Cendant Mortgage) did not provide disclosures during contract negotiations on FCC regulator statues and precautions that a Plaintiff would need to take in order to protect youth from predators, privacy and intellectual property violations that would occur.
13. Assurant Devices is the insurance provider that replaced lost, stolen, damaged phones for T-Mobile, Xfinity and ATT in Harris County Precinct 4
14. Between October 2022- present Plaintiff, Plaintiff's employee's and family have all reported stolen apple phones and devices on a consistent basis.
15. HARRIS COUNTY Pays 30 % of the salary for Harris County Constables and Sheriffs.
16. Kenswick Home Owners Association pays 70% of the salary for Harris County Constables and Sheriffs
17. Humble Police Department reports traffic violations directly to the Texas Department of Transportation.
18. Eden Corporation, ASSURANT DEVICE SERVICES, INC, PHH MORTGAGE and SUNRUN GEMINI MANAGER were all registered in the state of Texas by CORPORATION SERVICE COMPANY DBA CSC - LAWYERS INCO and have a vested interest in REAL PROPERTY 19902 RUSTLEWOOD DR. HUMBLE, TX 77338.
19. February 8, 2023-February 14, 2023: Plaintiff disconnected internet during this time and was not able to communicate with her daughter. Daughter could only use her mobile device when connected to the Xfinity Wi-Fi access point available throughout Harris County. and all devices to be tracked on state's network.
  - (Plaintiff had the same Comcast Cable account from March 7, 2014-February 11, 2023, Account #: 8777702120900324, and new service was restore on February 17, 2023 and remained active until August 16, 2023, Account # 877702122904696; Therefore **family was without Wifi for a total of 6 days during this particular time period.**)
20. February 12, 2023: Precinct 4 Constables falsified reports and aligned documents with the department of vital statistics (TRESA, HOPKINS), and made several changes within the call script when Plaintiff called to document that home network was hacked while submitting a grant application to the Texas Education Agency. Plaintiff documented that responding officer, Gloria Villarreal, had the same Surname as Christina Villarreal, Grant administrator at the Texas Education Agency who works in the office alongside her mother Anita Villarreal.



21. February 13, 2023: Plaintiff, traveled to 6831 Cypresswood Dr. Spring, Texas 77379, and requested that the officers look into the hacking incident and instead I was given a consent to search form as if I was under investigation for a crime.
22. February 14, 2023: Plaintiff's daughter calls 911 because she cannot call out on her phone or contact her mother, and the 911 operator connects Eboni to the Plaintiff.
23. February 17, 2023: Comcast initiates New Services, Account # 877702122904696
24. February 17, 2023: Plaintiff files a complaint about the police brutality.
25. February 17, 2023: Plaintiff travels to St. Luke to seek medical attention and nurse does not provide treatment for pain and accuses plaintiff of requesting narcotics. Documentation from the hospital states that the Plaintiff should continue taking hydrocodone and amoxicillin, and when Plaintiff ask further questions the nurse accused the Plaintiff of requesting narcotics and threaten to call security after the Plaintiff had just opened up to her about the police brutality that prompted the visit. After the nurse's outburst the Plaintiff could not call out on her phone, and every phone that was used by the Plaintiff in the hospital would not dial out, and the Plaintiff had to result to fellow patients for support in hopes to reach a family member. Plaintiff's mother was aware of the situation and phone the Plaintiff's sister and brother in law that is a clinician whom arrived to communicate with the staff. After the Brother In Law noticed the escalated blood pressure he stated that they should have at least give you something to bring this down which is most likely due to stress. Once he communicated, we were checked back in only for the purpose of a psychiatric evaluation, and we decided to leave.
26. February 28, 2024: Traveled to 6831 Cypresswood Dr. Spring, Texas 77379 and Kameron Mulkey requested that I sign the Cease Investigation, and I did not sign because there was no one that was identified in regards to Cyber-attack.
27. March 8, 2023, Plaintiff filed a motion after receiving notice that Precinct 4 agreed with the actions of the officers.
28. March 28, 2023, Officers were served
29. April 7, 2023, Plaintiff was sexually assaulted
30. April 8, 2023 @ 5:59 am after waiting for a Sexual Assault Exam Methodist Hospital treated Plaintiff for Blood Pressure, and would not take any physical evidence of Sexual Assault without a Psychiatric Exam because the nurse needed to know what the Plaintiff was going to say to the Defense attorney. When the Plaintiff communicated with the nurse that the antidote for STD's needed to be given within 3 days the nurse responded that according legislation that he had 5 days to provide treatment. Methodist Hospital asked Plaintiff to sign a letter entitled "Leaving the Hospital Against Medical Advice"
31. April 9, 2023 same officers present for the assault at 19902 Rustlewood Dr. Humble, TX 77338 arrived at Emergency Hospital Systems – Deerbrook, 8901 Farm to Market 1960 Bypass Rd W Suite 105, Humble, TX 77338 arrived at 12: 00 am to take the report. After the SANE nurses completed their exam and took Plaintiff's blood they communicated to Plaintiff that she was free to leave, and the Plaintiff returned on the following day out of remembrance that prescriptions, and discharge documents where not provided. Plaintiff had to complete the entire enrollment application once more. During the exam ESD 11 EMS SANE nurses took blood and vaginal swabs and did not document it in the report, and told the Plaintiff to call and get the results.
32. May 8, 2023: District Attorney served as counsel for Precinct 4 Constables
33. June 9, 2023: District Attorney Motion to Dismiss
34. July 3, 2023: NOTICE OF SUBMISSION (MOTION TO DISMISS)
35. July 3, 2023: NOTICE OF SUBMISSION (MOTION TO EXTEND)
36. July 5, 2023: ORDER (DISMISSED WITH PREJUDICE)
37. August 16, 2023: Comcast Cable Cancels, Account # 877702122904696
38. August 21, 2023: NOTICE OF SUBMISSION PLANTIFF'S MOTION TO WITHDRAW AS COUNSEL
39. September 2023: JOHN GALLAGHER provided support through SIMPLY HONEST MOBILE, to establish YUBI KEYS, and secure home network.
40. February 21, 2024: Plaintiff reported to Harris County Precinct via email ([Jeffrey.lee@cd4.hctx.net](mailto:Jeffrey.lee@cd4.hctx.net)) that



the home network established by John Gallagher displayed abnormalities, and that Mr. Gallagher resembled the young man that solicited Plaintiff's 5<sup>th</sup> grade daughter, Eboni for inappropriate pictures in 2019.

41. Plaintiff never received any documents certified mail from District Attorney in court case filed against Harris County Constables.
42. Computers and cellphones that were turned in to Precinct 4 Cyber Crimes team for investigation have been stolen from Toyota Highlander on March 5, 2024 in the parking lot of Academy, 9470 FM 1960, Humble, TX 77338, in Humble Police jurisdiction. On April 18, 2024 Plaintiff called 911 to report the crime, and NBC news reported "Major 911 outages in 4 states leave millions without an easy way to contact authorities" Another phone was stolen from Plaintiff at DUKE'S located 6303 Farm to Market 1960 Rd E, Humble, TX 77338 in the Sherriff's Jurisdiction, and the Plaintiff desired to report both incidents, with the plethora of events, and the Precinct 4 Constable that arrived instructed the Plaintiff to drive down to the Academy and call the Humble Police Department. Therefore; this is the official report of the stolen computers.
43. Computers and cellphones that are stolen and reported are later placed in vehicles after being called to the dealership for possible trade in offers.
44. Sergeant Jeffery Lee and Kamron Mulkey have not taken any cases to trial file for cyber-attacks in the last 2 years, and have not identified individuals responsible for cyber-attack or if John Gallagher was questioned in relation to the inappropriate pictures solicited from Plaintiff's daughter Eboni in 2019.
45. Plaintiff has received confirmation from Assurant Device Insurance to confirm personal information has been compromised.
46. Harris County Sheriffs have not investigated the Sexual Assault of Plaintiff.
47. Attorney General has not Awarded Crime Victims Compensation.
48. June 23, 2024 Plaintiff reported fraud to T-Mobile's on lines ending in -1591, -2001, -9523, - and 8002 to T-Mobile Business Store HWY 6. Upon arrival Carlos requested that the Plaintiff, provide the representative with the PIN number, and the Plaintiff refused to provide the PIN due to the confidentiality, and the fact that it would allow the retailer with the ability to clone the device, and remotely access the account and order additional devices through Assurant Insurance Claims. Carlos insisted on the Plaintiff providing the Pin, and the Plaintiff, continued to insist that it was proprietary information and demanded that she enter the information on her own. Plaintiff was then referred to the store manager, Martin, that entered the fraud claim in the managers office outside of the presence of the customer, after using a temporary PIN from a phone that was not consistently used. During this time we were able to determine that a duplicate device was ordered in April 2024 from Assurant Mobile Device Insurance Coverage. Plaintiff did not order the device, which prompted the fraud claim.
49. Each Month July 2024, August 2024, September 2024 October 2024 to present entering November 2024 Plaintiff continued to communicate with T Mobile in regards to fraud, additional charges that should not have been accessed, and eventually had to acquire an additional device from Boost Mobile Devices in September of 2024

#### BOOST MOBILE AS OF SEPTEMBER 28, 2024

50. Plaintiff started new lines with Boost (Z Cellular LLC) due to T-Mobile's fraud on lines ending in -1591, -2001, -9523, -8002, and the increased energy usage due to the transmission of Wi-Fi signal on router and Mobile Devices without Plaintiff's permission.
51. Boost (Z Cellular LLC) assigned ESIM from cloned device to Plaintiff's phone, and the phone of Plaintiff's contacts without permission violating privacy in relationship to K-12 policies and school districts.
52. Plaintiff's utilities were disconnected and reconnected upon the start of Boost (Z Cellular LLC) services with the support of coconspirators not listed in suit.

#### VI. PLAINTIFF'S CLAIM OF NEGLIGENCE

53. Defendant had a duty to exercise the degree of care that a person of ordinary prudence would use to



avoid harm to others under circumstances similar to those described herein.

54. Plaintiff's injuries were proximately caused by Defendants negligent, careless and reckless disregard of said duty.
55. The negligent, carless and reckless disregard of duty of Defendant and conspirators consisted of, but is not limited to the following acts and omissions:
  - A. Defendant had the fiduciary duty to investigate the insurance fraud with Assurant Mobile Devices regarding the duplicate devices being carried on multiple networks with customer phone numbers and international charges accessed.
  - B. Defendant had the fiduciary duty to investigate the alias Lakeisha Manifee being used on Abundance Energy Consortium, LLC account with out Plaintiff consent.
  - C. Defendant had the fiduciary duty to investigate the additional user account, (2 additional accounts) being added to Business account without Plaintiff consent.
  - D. Defendant had the fiduciary duty to investigate in February 2023-April 2023 the ID's scanned on the account after Lakeisha Menifee formally Lakeisha Hamilton, Lakeisha Hamilton-Reed brought all her identification into the retail store and informed the representative that she was a victim of identity theft.
  - E. Defendant had the fiduciary duty to investigate DMCA copyright violation of publication Our Hearts Together to prevent further injury and use of the Amazon cloud on phone number XXX-XXX-9115 that allowed publication of text on unauthorized sites.
  - F. Defendant had the fiduciary duty to investigate the identity fraud with Xfinity Mobile in regard to duplicate devices which creates financial injury through access to financial institutions and banking applications.
  - G. Defendant had the duty of care to investigate the fraud report by customer in as having duplication of devices grants access to location and the ability to cause repeated harm.
  - H. Defendant had the duty of fiduciary duty to investigate the fraud reported by customer as a result of intellectual property, and the impact on the ability maintain trade secrets.
  - I. Harris County Constables and Sheriffs or Precinct 4 had a duty to exercise the degree of care to serve and protect Plaintiff, to avoid harm during standard welfare check described
  - J. Harris County Constables and Sheriffs or Precinct 4 had a duty to investigate the cyber-stalking in ordinary prudence contrary to the adversary criminalization of a victim.
  - K. Harris County Sheriffs or Precinct 4 had a duty to investigate the sexual assault in ordinary prudence contrary to the adversary criminalization of a victim.
  - L. Assurant Device Services had a duty to disclose to the public protocols in device returns that would ensure security to and prevent financial crimes amongst citizens i.e. youth, seniors, intellectually impaired.
  - M. Kenswick Homeowner Association had a duty to exercise the degree of care that an organization of ordinary prudence would use to avoid harm to others and ensure deed restrictions were equitable and not aimed at Plaintiff (Targeted Individual) after death of father during home renovations due to mold, while family was stationed in a hotel.
  - N. SUNRUN INC had a duty to exercise the degree of care that an organization of ordinary prudence would use to avoid harm to others disclose that solar panels were free, and Goodleap is company that utilizes Artificial Intelligence to remotely manage the solar panels and this was an optional service to prevent additional cyberattack and financial scams.
  - O. SUNRUN GEMINI MANAGER had a duty to disclose that 19902 Rustlewood Dr. Humble, TX 19902 would be placed on the same network as STEM UP's Office Location 1002 Gemini St. Houston, TX 77058 and any affiliations with partnering companies to prevent Plaintiff's SUBSIDIARIES ROCKETLADY UNLIMITED ENTERPRISES, LLC, ABUNDANCE ENERGY CONSORTIUM (formally, ABUNDANCE EDUCATIONAL CONSULTING, LLC), ROCKETLADY UNLIMITED, LLC AND STEM UP 501 c3 financial injury suffered due to ransomware attacks by Houston Realty Holdings.



- P. HARRIS COUNTY APPRAISAL DISTRICT had a duty to exercise the degree of care that an organization of ordinary prudence would use to avoid harm to others and ensure homestead exemption remained on real property in the even the deed on file maintains the same loan and FHA number removing Homestead Exemption created further financial hardship during time of bankruptcy.
- Q. HARRIS COUNTY APPRAISAL DISTRICT had a duty to exercise the degree of care that an organization of ordinary prudence would use to avoid harm to others and ensure solar exemptions were applied to real property versus a fraudulent lien placed by software provider creating extenuating financial injury to Plaintiff.
- R. HARRIS COUNTY APPRAISAL DISTRICT had a duty to exercise the degree of care that an organization of ordinary prudence would use to avoid harm to others and ensure deed restrictions were equitable and not aimed at Plaintiff.

#### VII. DAMAGES

56. As a direct and proximate result of the occurrence made basis if this lawsuit, Plaintiff, DR. LAKEISHA MENIFEE (ALSO KNOWN AS LAKEISHA HAMILTON, LAKESHA Y. HAMILTON, LAKEISHA Y. MENIFEE, Lakeisha Y. Hamilton, LAKEISHA HAMILTON-REED, LAKEISHA REED, LAKEISHA Y. REED, DR. KIKI, and SUBSIDIARIES ROCKETLADY UNLIMITED ENTERPRISES, LLC, ABUNDANCE ENERGY CONSORTIUM (formally, ABUNDANCE EDUCATIONAL CONSULTING, LLC), ROCKETLADY UNLIMITED, LLC AND STEM UP 501 c3 was caused to suffer serious bodily injuries, and to incur the following damages for which Plaintiff seeks Monetary relief of \$109,976,832.71 and a continuum of negotiated royalties as it aligns to attached invoices. These expenses were incurred by Plaintiff calculation of royalties and use of utility easement and does not include the:

- A. Reasonable medical care and expenses in the past necessary care and treatment of the injuries resulting from the violation GANG STALKING.
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Loss of earnings in the past;
- F. Loss of earning in the past;
- G. Loss of earning capacity which will, in all probability, be incurred in the future;
- H. Mental anguish in the past;
- I. Mental anguish in the future;
- J. Physical Impairment in the past;
- K. Physical Impairment in the future; and
- L. Property damages including, but not limited to, the difference in market value of the property immediately before and after occurrence in question
- M. ALL Legal fees and damages associated with corresponding matters in alignment with conspirators of GANG Stalking.

#### VIII. REQUIRED DISCLOSURE

- 50. Pursuant to Texas Rule of Civil Procedure 194(a), a Defendant is required to disclose, within thirty (30) days of the filing of the first answer, the information or material described in Rule 194.2(b)1-2.
- 51. All conditions precedent for the acquisition of the Property and the interest described in the petition have been performed or have occurred, including but not limited to:
  - A. Plaintiff has made a good faith bona fide negotiation during fraud investigation to clarify misunderstandings to foster a contract negotiation;
  - B. Plaintiff and Defendant are unable to agree upon damages as a result accrued as a result of injury received during, conspired Gang Stalking of Defendants partners.
  - C. Plaintiff has provided Defendant opportunities for arbitration, via Offer and Demand Letters, contract negotiation and Defendant has failed to move forward with the process prevent



deliberation, and caused Plaintiff continued injury.

52. Plaintiff demands contract outlining utility easement use that is currently being defrauded from family through Reliant Energy Retail, LLC and Conspirators use of Gang Stalking through **(Controlling one's fortune, sex-trafficking, sextortion of minor children, and police brutality = slavery)**.

#### IX. PRAYER

WHEREFORE, PREMISES CONSIDRED, Plaintiff, DR. LAKEISHA MENIFEE (ALSO KNOWN AS LAKEISHA HAMILTON, LAKESHA Y. HAMILTON, LAKEISHA Y. MENIFEE, Lakeisha Y. Hamilton, LAKEISHA HAMILTON-REED, LAKEISHA REED, LAKEISHA Y. REED, DR. KIKI, and SUBSIDIARIES ROCKETLADY UNLIMITED ENTERPRISES, LLC, ABUNDANCE ENERGY CONSORTIUM (formally, ABUNDANCE EDUCATIONAL CONSULTING, LLC), ROCKETLADY UNLIMITED, LLC AND STEM UP 501 c3, respectfully prays that the Defendant, T-Mobile PV/SS PCS, LLC, be cited to appear and answer herein, and that upon a final hearing of the cause judgement be entered for the Plaintiff against Defendant for damages in an amount of \$109,976,832.71, and the Defendant cover legal expenses of the Plaintiff. **Plaintiff's prayer this March 14, 2025**, is to establish an opportunity for growth that will allow new beginnings and without fear courageous with LOVE, "OUR HEARTS TOGETHER," and that there be at least one just within the multitude to hear this cause of action.

Respectfully submitted:

Date **March 14, 2025** Signature **/s/Dr. Lakeisha Menifee**

Dr. Lakeisha Menifee  
19902 Rustlewood Dr.  
Humble, TX 77338  
Email: [menifeelakeisha@gmail.com](mailto:menifeelakeisha@gmail.com)  
Pro Se Litigant

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION FOR SUMMARY JUDGEMENT was served via United States Marshall, mail, postage prepaid and/or email on March 14, 2025 on the following parties:

LaTasha Snipes  
Texas Bar No. 24072504  
Polsinelli PC  
1000 Louisiana Street, Suite 6400  
Houston, TX 77002  
[menifeelakeisha@gmail.com](mailto:menifeelakeisha@gmail.com)  
Telephone: (713) 374-1600  
Facsimile: (713) 374-1601  
Email: [tsnipes@polsinelli.com](mailto:tsnipes@polsinelli.com)  
Email: [acartwright@polsinelli.com](mailto:acartwright@polsinelli.com)  
Email: [TMobileArbitrations@polsinelli.com](mailto:TMobileArbitrations@polsinelli.com)

Reliant Retail Energy, LLC  
Bruce Stevenson (Regulatory Manager)  
P.O. BOX 4567  
Houston, TX 77210-4567  
Telephone: 713-207-6072  
Email: [b Stevenson@reliant.com](mailto:b Stevenson@reliant.com)

Lakeisha Menifee  
Pro Se Litigant  
19902 Rustlewood Dr.  
Humble, TX 77338  
Email:

EMIL R. SARGENT  
TBN: 17648750  
2855 Mangum Road, Ste. A-569  
Houston, Texas 77092  
Telephone: 713.222.2299  
Facsimile: 713.224.6812 -  
[law.e@sbcglobal.net](mailto:law.e@sbcglobal.net)  
Attorney for Debtor



April F. Robbins  
Chad W. Robbins  
Sharlyn Bachman  
Vickie Naylor  
CanteyHanger,LLP  
600 West 6th Street, Suite 300  
Fort Worth, Texas 76102  
[arobbins@canteyhanger.com](mailto:arobbins@canteyhanger.com)  
[crobbins@canteyhanger.com](mailto:crobbins@canteyhanger.com)  
[sbachman@canteyhanger.com](mailto:sbachman@canteyhanger.com)  
[vnaylor@canteyhanger.com](mailto:vnaylor@canteyhanger.com)  
Attorneys for the Defendant  
Assurant Devices Services, Inc.

Jana Tevis  
[jtevis@grsm.com](mailto:jtevis@grsm.com)  
Clyde O. Adams  
State Bar No. 24026761  
[coadams@grsm.com](mailto:coadams@grsm.com)  
1900 West Loop South, Suite 1000  
Houston, Texas 77027  
Telephone: (713) 961-3366  
Facsimile: (713) 961-3938  
Attorneys for the Defendant  
SUNRUN GEMINI MANAGER

Goodeap  
Maria Mellott-Vice President Deputy Chief Compliance Officer  
8781 Sierra College Blvd  
Roseville, CA 95661  
Telephone: 916-772-9048  
Email: [consumercomplaints@goodleap.com](mailto:consumercomplaints@goodleap.com)

ATT  
P.O. BOX 10330  
Fort Wayne, IL 46851-0330

Xfinity Mobile  
Comcast Customer Security Assurance  
Attention Fraud Department  
1800 Bishops Gate Blvd.  
Mt. Laurel Township, NJ 08054

Mike Calvert Toyota  
2333 S. Loop W.  
Houston, TX 77054-2811

Tejas Toyota



19011 Highway 59 North  
Humble, TX 77338

BSG SMART Home Security  
12702 Cimarron Path  
San Antonio, Tx. 78249  
(210) 877-1222

*/s/Dr. Lakeisha Meniffee*  
**DR. LAKEISHA MENIFEE**